

AO 91 (Rev. 02/09) Criminal Complaint

United States District Court
Southern District Of Texas

FILED

UNITED STATES DISTRICT COURT

APR 21 2020

for the

Southern District of Texas

David J. Bradley, Clerk

United States of America

v.

Marinelli HINOJOSA-Cantu (YOB 1976) USC

SEALED

Case No. M-20-0888-M

Defendant

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date of 04/16/2020 in the county of Starr in the Southern District ofTexas, the defendant violated 8 U. S. C. § 1324(a)(1)(A)(iii)

, an offense described as follows:

Knowing or in reckless disregard of the fact that Brayan Jose JARA-Castro (COB: Ecuador), Olga Lucia CUJILEMA-Gualacio (COB: Ecuador), Segundo Liberato QUIZHPI-Pallchizaca (COB: Ecuador) and twenty-seven (27) others, for a total of thirty (30), who were aliens, who had come to, entered or remained in the United States in violation of law, concealed, harbored, or shielded from detection or attempted to conceal, harbor, or shield from detection, such aliens in any place, including any building or any means of transportation; to wit: a residence in Rio Grande City, Texas.

This criminal complaint is based on these facts:

See Attachment "A"

☒ Continued on the attached sheet.

Approved by AUSA /s/ Laura Garcia

Submitted by reliable electronic means, sworn to and attested telephonically per FED.R.CR.4.1, and probable cause found on:

Date: 04/21/2020City and state: McAllen, Texas

/s/ Carl A. Kailipaka

Complainant's signature

Carl A. Kailipaka, HSI Task Force Officer

Printed name and title

Judge's signature

J. Scott Hacker, U.S. Magistrate Judge

Printed name and title

ATTACHMENT A

I, Carl A. Kailipaka, am a Task Force Officer (TFO) assigned to the United States Homeland Security Investigations (HSI), Falcon Dam, Texas and have knowledge of the following facts:

On Thursday, April 16, 2020, at approximately 8:40 AM, U.S. Border Patrol Agents in Freer, Texas, apprehended thirty (30) undocumented aliens (UDAs) being transported in the back of a dump truck the aliens were suspected to have been loaded from the Rio Grande Valley area,

HSI TFOs traveled to Laredo North, Texas Border Patrol Station to conduct interviews of the smuggling UDAs.

Brayan Jose JARA-Castro one of the UDAs from Ecuador stated he was to pay \$12,000.00 United States Dollars (USD) to be smuggled into the United States. After smugglers illegally crossed him and a group through the river he was initially taken to an abandoned house, then later a ranch then taken to a last house before loading into the dump truck. At the last house they were received by a male subject who he identified as [redacted] and a female who he thought was [redacted]

JARA stated he had photographs of [redacted] saved on his cellular telephone. JARA provided HSI TFO's verbal and written consent to search his cellular telephone, showing agents several images of the UDA's with a male he identified as [redacted]

JARA stated in the early morning of April 16, 2020, [redacted] instructed everyone to go outside and enter the rear of an awaiting dump truck. JARA stated [redacted] provided a ladder for them to climb inside the dump truck.

Through research and queries run on US Border Patrol systems, HSI TFO's were able to identify the alias [redacted] as United States Citizen (USC) [redacted] and the female was identified as USC [redacted]

JARA was then presented with two photo lineups. In one lineup JARA identified [redacted] as being [redacted]. In the other lineup JARA identified [redacted] as the female who provided them with food and water.

Olga Lucia CUJILEMA-Gualacio another of the UDAs from Ecuador stated she was going to pay \$14,000.00 USD to be smuggled into the United States. CUJILEMA stated that she and several other Ecuadorians illegally crossed into the United States. CUJILEMA stated she was transported to several stash houses and could remember where one of the houses was located via Google maps. CUJILEMA stated that at the last stash house they went to there was a male subject they called [redacted]

CUJILEMA stated [redacted] said he was the boss. CUJILEMA said [redacted] also took a picture with the group. CUJILEMA stated there was also a female at the stash house she believes was the wife of [redacted]. CUJILEMA stated that the dump truck she was being transported in was located at the last stash house and instructed her to climb into the dump truck.

CUJILEMA was presented with two photo lineups. In one lineup CUJILEMA identified [redacted] as being [redacted]. In another lineup CUJILEMA identified [redacted] as the female in the home with [redacted].

Segundo QUIZHPI-Pallchizaca, another of the UDAs from Ecuador, stated that he was going to pay \$15,000.00 USD to be smuggled into the United States. QUIZHPI stated that at the last stash house a subject known to him as [redacted] oversaw the stash house. QUIZHPI stated there was also a female subject with [redacted]. QUIZHPI stated [redacted] told them to go outside to the dump truck.

QUIZHPI gave agents verbal and written consent to search his cellular telephone. Agents found a picture of a Google map pin drop on his cellular telephone which QUIZHPI stated was the location of the last stash house. QUIZHPI was able to identify the location of the stash house, via Google maps, as being located at [redacted] in Rio Grande City, Texas.

QUIZHPI was able to identify [redacted] in a picture taken at the stash house on JARA-Castro's cellular telephone. QUIZHPI was able to identify [redacted] in a photo lineup as the female at the stash house with [redacted] that gave them food and water.